

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) **File No. EO-2015-0055**
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

**JOINT STATEMENT OF POSITION OF NATIONAL HOUSING
TRUST AND TOWER GROVE NEIGHBORHOODS
COMMUNITY DEVELOPMENT CORPORATION**

COME NOW the National Housing Trust (“NHT”) and Tower Grove Neighborhoods CDC (TGNCDC), by and through the undersigned counsel, pursuant to the Missouri Public Service Commission’s (“Commission”) April 8, 2015 *Order Granting Revised Motion to Modify Procedural Schedule*, and hereby submit their Statements of Position in the above-captioned case. The issues addressed herein are numbered according to the *List of Issues*¹ filed by the Commission Staff on May 4, 2015. NHT and TGNCDC reserve the right to modify the positions provided herein and to take additional positions as the case proceeds.

1. Should the Commission approve, reject or modify Ameren Missouri’s MEEIA Cycle 2 Plan (hereafter the “Plan”)?

The Commission should modify the Plan to pursue a much higher level of efficiency savings that is, at a minimum, consistent with the intent of the MEEIA statute and regulations (4 CSR 240-20.094). The proposed Plan is premised on a Market Potential Study that underestimates the achievable savings and does not clearly identify the achievable savings in the low-income multifamily sector: testimony submitted by NRDC witness Phil Mosenthal, including a potential study for multifamily affordable housing, indicates that the untapped savings are substantial and far higher than what is included in the proposed Plan. In addition to increasing

¹ See File No. EO-2015-0055, *List of Issues, Order of Opening Statements, Order of Witnesses, and Order of Cross-Examination*. May 4, 2015.

the goals in the Plan, the Commission should modify the Plan to tap into these savings: the Plan should incorporate best practices for reaching multifamily affordable housing, a hard-to-reach sector, as identified in the testimony of witnesses Annika Brink (NHT) and Dana Gray (TGNCCDC).

Absent such modifications, NHT and TGNCCDC do not recommend approval of the Plan.

2. Do the programs in the Plan, and associated incremental energy and demand savings, demonstrate progress toward achieving all cost-effective demand-side savings consistent with state policy (as established by MEEIA)?

No, they do not. In particular, Ameren's Low-Income Residential program makes only a minority of low-income residents eligible for these measures (those in HUD, USDA, or public housing), as outlined in Annika Brink's prior testimony. The Plan cannot demonstrate credible progress toward achieving the available savings in affordable multifamily buildings, because approximately 74% of affordable multifamily buildings are not even covered by the Low-Income Residential program or targeted by any other program in the Plan: of all affordable multifamily buildings in Ameren service territory, 54% are unsubsidized, 20% are LIHTC, and the remaining 26% are eligible for Ameren Missouri's Low-Income Residential program as filed. (See Annika Brink's Rebuttal testimony on behalf of NHT for a more in-depth discussion.)

3. If the Commission approves a Plan, what are the components of the demand-side programs investment mechanism and how will each of the components be administered?

NHT and TGNCCDC take no position on this issue, but reserve the right to give input at a later time.

4. If the Commission approves a Plan, what variances from Commission rules based on a showing of good cause are necessary?

NHT and TGNCCDC take no further position on this issue, but reserve the right to give

input at a later time.

Office of the Public Counsel's Issues:

1. If the Commission approves a plan, should the total resource cost test be applied uniformly when calculating net shared benefits?

NHT and TGNCCDC take no position on this issue, but reserve the right to give input at a later time.

2. If the Commission approves a demand-side programs investment mechanism that includes a performance incentive, should the performance incentive be included as a cost when calculating the net shared benefits?

NHT and TGNCCDC take no position on this issue, but reserve the right to give input at a later time.

Sierra Club's Issue:

1. In assessing the cost-effectiveness of demand-side programs, should Ameren Missouri consider the results of the utility cost test?

NHT and Tower Grove take no position on this issue, but reserve the right to give input at a later time.

Missouri Division of Energy's Issue:

1. If the Commission modifies Ameren Missouri's MEEIA Cycle 2 Plan what modifications should the Commission adopt?

Please refer to the general question #1 above, "Should the Commission approve, reject or modify Ameren Missouri's MEEIA Cycle 2 Plan (hereafter the "Plan")?" where NHT and TGNCCDC believe they have addressed this question.

Respectfully Submitted,

/s/ Andrew J. Linhares

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 11th day of May, 2015.

/s/ Andrew J. Linhares

Andrew J. Linhares